

WK:MJB
F. #2019R01372

FILED
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U.S. DISTRICT COURT E.D.N.Y.

★ JUN 18 2020 ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

LAW OFFICES OF THE U.S. ATTORNEY

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

HAO BO JIANG,

Defendant.

Cr. No. C R 20 21 8

(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(vii), 841(b)(1)(E)(i), 846,
853(a) and 853(p); T. 18, U.S.C., §§ 2
and 3551 et seq.)

VITALIANO, J.

----- X

THE GRAND JURY CHARGES:

MANN, CH. M.J.

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Marijuana)

1. In or about and between October 2016 and October 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HAO BO JIANG, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of marijuana involved in the conspiracy attributable to the defendant as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 100 kilograms or more of a substance containing marijuana.

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(vii); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Possession with Intent to Distribute Controlled Substances)

2. On or about October 8, 2019, within the Eastern District of New York, the defendant HAO BO JIANG, together with others, did knowingly and intentionally possess with intent to distribute one or more controlled substances, which offense involved (a) 100 kilograms or more of a substance containing marijuana, a Schedule I controlled substance; and (b) a substance containing ketamine, a Schedule III controlled substance.

(Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(vii) and 841(b)(1)(E)(i); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



ROBERT P. DONOGHUE
FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 

ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

F.#: 2019R01372
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of NEW YORK*

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

HAO BO JIANG,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(vii), 841(b)(1)(E)(i), 846,
853(a) and 853(p); T. 18, U.S.C., §§ 2 and 3551 *et seq.*)

A true bill.

Robert Trener -----

Foreperson

Filed in open court this _____ day,
of _____ A.D. 20_____

Clerk

Michael J. Bushwack, Assistant U.S. Attorney (718) 254-6454